

STATEMENT OF BASIS

**Colonial Marble Products, LTD.
Petersburg, Virginia**

EPA ID No. VAD 062355904

I. Introduction

This Statement of Basis is for the former Colonial Marble Products facility, located at 1412 Farmer Street in Petersburg, Virginia.

After reviewing the results of the Closure Report for Drum Storage Pad, the United States Environmental Protection Agency (EPA) believes that no further corrective action is necessary at Colonial Marble at this time, and is proposing a final decision of Corrective Action Complete Without Controls. This proposal is consistent with current EPA guidance entitled *Final Guidance on Completion of Corrective Action at RCRA Facilities* (February 25, 2003). The purpose of this document is to solicit public comment on the proposal that corrective action is complete without controls.

The Colonial Marble facility is subject to the Corrective Action Program under the Resource Conservation and Recovery Act (RCRA). (For more information on RCRA Corrective Action, please visit the Region III web site at www.epa.gov/reg3wcmd/correctiveaction.htm). The Corrective Action program is designed to ensure that facilities have investigated and cleaned up any releases of hazardous waste or constituents that may have occurred at their property. Region III is using the administrative procedures found in 40 CFR Part 270 to solicit public comment prior to making its final corrective action decision for the Colonial Marble facility.

II. Facility Background

The former Colonial Marble Products facility is located at 1412 Farmer Street in Petersburg, Virginia at the southeast corner of the intersection of Farmer Street and Fairgrounds Road. The facility contains a two-level masonry block building with concrete floors on approximately 1.6 acres of land on the south side of Farmer Street. The site building is approximately 128 feet wide from east to west and 284 feet long from north to south. There are no other structures on the facility.

The facility is currently unused. The initial use of the site was for the sale/storage of tobacco, conveyed to Farmer's Realty Corporation by the City of Petersburg, in 1955. The property was then conveyed to Mr. T. Winston and Kathleen Pruitt (former owner, unspecified usage) in 1959, and then to The Farmer Street Company in 1972 (use not

specified). In 1981, The Farmer Street Company conveyed the property to Arthur Winer Incorporated (use not specified), which was subsequently conveyed to Yukon Associates (current owner) in 1985, where it was utilized for the manufacturing of cultured marble operating as Colonial Marble from 1985 to 1997. From 1998-1999, Bloom Brothers Furniture Store utilized the property for new furniture storage. Pennington Seed, Inc. used the property for approximately one year in 2000 for storage. The building was reportedly vacant from January 1, 2001 to April 30, 2002. From May 2002-January 2004, the site was used by Central Marketing for storage of equipment. Since February 2004, the property has not been occupied.

Colonial Marble generated hazardous waste materials in 55-gallon drums during cleaning of equipment and materials. The materials used to make the synthetic marble are not characterized as hazardous; however, the cleaning solvents used to clean molds, hand tools and other equipment are hazardous. They contain methylene chloride and various components of the brand name solvents "Tipsolve" and "Super Flush." These components included a few F001 and F005 listed hazardous waste constituents. The 55-gallon drums containing hazardous waste were stored in the basement in an area called the "Drum Storage Area". It is also referred to as the "Drum Storage Pad".

III. Investigation of the Drum Storage Pad

Colonial Marble submitted a "Closure Plan" for the Drum Storage Pad to the Virginia Department of Quality ("VDEQ") on March 28, 2000. The Closure Plan was approved by VDEQ on April 10, 2000. The Closure Plan involved sweeping of the Drum Storage Area, sampling soils under the concrete floor slab, pressure washing of the Drum Storage Pad, sampling the waste wash and rinse water for potentially hazardous parameters.

On June 7, 2000, Colonial Marble's contractor Virginia Geotechnical Services (VGS) performed the initial concrete floor sweeping at the Drum Storage Area. Boards and plywood that had been stacked on the Drum Storage Pad were cut up and removed. The concrete floor was then inspected for cracks, gaps or other avenues through which contamination may have migrated to the soils. There were no new cracks and/or gaps found during the inspection. Only the existing joint between the masonry wall and the concrete floor, which was previously identified, was visible.

On June 22, 2000, VGS personnel drilled three holes through the concrete floor along the floor/wall joint. The holes were six inches in diameter. No gravel was observed below the concrete floor slab at the three locations. Soil samples were taken at intervals of 0-6 inches and 6 -12 inches. A total of six soil samples were taken and analyzed for five volatile organic compounds. Laboratory results indicated that one of the six soil samples collected from underneath the concrete pad contained a concentration of 24.2 ppb (parts per billion) of methyl ethyl ketone (MEK). A risk assessment was

performed in accordance with guidelines provided by VDEQ based on the sampling performed. The risk assessment indicated that the risk associated with exposure to soil for any receptors on the site does not exceed acceptable levels. The low concentration of MEK does not pose an unacceptable risk to human health or the environment.

After filling the joint between the concrete floor slab and the masonry wall and filling in holes drilled in the floor to obtain soil samples, the floor was washed and rinsewater samples collected. The rinsewater samples were tested for volatile organic compounds. Laboratory tests indicated there were no detectable concentrations of concern in the rinse water. Contaminants of potential concern are defined as analytes that either exceed the screening levels established for the facility, or have non-risk related attributes that necessitate their inclusion in a human health risk assessment.

A Report of Closure for the Drum Storage Pad was submitted by Colonial Marble to VDEQ on September 28, 2000. The Report documents the sampling and cleanup activities described previously. After review by VDEQ, a Notice of Clean Closure was issued for the regulated Container Storage Area on November 09, 2000, by VDEQ. In this letter, the VDEQ responds to the Closure Report submitted on September 28, 2000, stipulating that all closure activities required by the approved Closure Plan were completed as required.

IV. RCRA Site Visit

On June 14, 2006 an onsite meeting was held to discuss the facility history, locate previously identified solid waste management units (SWMUs), verify the results of a file review and gather information concerning the facility's current conditions. Attendees at the meeting included VDEQ, Colonial Marble, and prospective buyers. From the June 14, 2006 site visit, no additional SWMUs or Area of Concern (AOC) were identified and observations of the former SWMU location were consistent with the facts of the Closure Report.

V. Conclusion

The investigation and clean closure of the Drum Storage Pad at the former Colonial Marble Products facility concludes corrective action at the facility at this time. The Drum Storage Pad does not pose an unacceptable risk to human health or the environment.

VI. Public Participation

EPA is requesting comments from the public on its tentative decision of No Further Corrective Action is necessary. The public comment period will last thirty (30) calendar days from the date that this matter is publicly noticed in a local newspaper

(October 24, 2006 to November 27, 2006). Comments should be sent to EPA in writing at the EPA address listed below, and all commenter's will receive a copy of the final decision and a copy of the response to comments.

A public meeting will be held upon request. Requests for a public meeting should be directed to Mr. Michael Jacobi of the EPA Regional Office at the address below or at (215) 814-3435.

The Administrative Record contains all information considered by EPA when making this proposal. The Administrative Record is available at the following locations:

U.S. Environmental Protection Agency - Region III
1650 Arch Street - 3WC23
Philadelphia, PA 19103-2029
Contact: Mr. Michael Jacobi
Voice: (215) 814-3435
Fax: (215) 814-3113
Hours: Monday - Friday, 8:00 A.M - 5:00 P.M.
E-mail: jacobi.mike@epa.gov

Commonwealth of Virginia
Department of Environmental Quality
629 East Main Street
Richmond, Virginia 23219
Hours: Mon-Fri, 9:00 AM – 4:00PM
Contact: Mr. Richard Hoagland III
Voice: (804) 698-4232
E-mail: rhoagland@deq.virginia.gov

Following the thirty (30) calendar day public comment period, EPA will prepare a final decision which will address all written comments and any substantive comments presented verbally at a public meeting. This final decision will be incorporated into the Administrative Record. If the comments are such that significant changes are made to this proposal, EPA will seek public comments on the revised proposal.